

## Illinois Environmental Protection Agency P.O. Box 19276, Springfield, IL 62794-9276

217/782-6761

Refer to: Johns-Manville Asbestos Disposal Area, Waukegan, IL

Lake Co./L0971900014

Superfund/Technical Reports

October 18, 1991

Mr. Brad Bradley Remedial Project Manager USEPA Region V RERB 5HS-11 230 South Dearborn St. Chicago, IL 60604

Dear Brad:

I have reviewed the revised Operation and Maintenance (0&M) Manual prepared by CRA, dated October 1991, for the Johns-Manville/Waukegan site.

This revised document addresses significant comments made on the previous draft and therefore is approved by this Agency.

I would however like to pass on one concern that is generally addressed in the document which may require clarification. Section 3.0 of the text (but not tables 2.1 and 2.2) states that the Agencies, "shall be notified if and when repairs are required to the clay layer [of the soil cover system]."

Because of the critical nature of significant repairs to the soil cover or roadway systems, where asbestos containing materials could be or have been disturbed, I would ask that the Agencies be notified as much in advance of the repair activity as possible so that we may be present if we so choose to inspect that work.

I would appreciate bringing this concern to Manville's attention. Please contact me if you have any additional comments on this document.

Kurt D. Neibergall, Assistant Unit Manager

Federal Sites Management Unit

Remedial Project Management Section Division of Land Pollution Control

KDN:pss

cc: Terry Ayers, IEPA Howard Chinn, IOAG Division File